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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALLSTATE INSURANCE COMPANY;  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY AND  
ALLSTATE INDEMNITY COMPANY,

Plaintiffs,

vs.

OBTEEN N. NASSIRI, D.C., et al.

Defendants.

2:20-cv-00425-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFFS TO  
RESPOND TO DEFENDANTS' MOTION  
TO DISMISS OR IN THE ALTERNATIVE  
MOTION FOR SUMMARY JUDGMENT  
(ECF NO. 51)**

**(First Request)**

Plaintiffs Allstate Insurance Company, Allstate Property & Casualty Insurance Company and Allstate Indemnity Company (collectively "Allstate") and Defendants Obteen N. Nassiri and Med Ed Labs (collectively "Defendants") by and through their respective counsel of record, hereby agree and stipulate to extend the time for Allstate to Respond to Defendants Motion to Dismiss or in the Alternative Motion for Summary Judgment (ECF No. 51) ("Motion").

This is Allstate's first request to extend time to respond to the pending Motion, or for any other reason in this Action. Defendants filed their Motion on May 18, 2020. (ECF No. 51). There is no hearing date set at this time. The reason for the request is that Allstate needs to coordinate the production of documents between multiple law firms in order to respond to the facts and allegations contained in the Motion. Given the common practice of remote working during the

COVID-19 pandemic, the additional time is needed to obtain and review the documents before completing Allstate's Response. This stipulation is made in good faith and is not made for the purposes of delay.

Accordingly, the parties agree and stipulate to extend the time for Allstate to respond to the Motion up to and including June 15, 2020. Defendants time to reply will run from the filing of Allstate's response pursuant to LR 7-2(b).

Dated: May 29, 2020

FRIZELL LAW FIRM

By: /s/ R. Duane Frizell  
R. Duane Frizell, Esq.  
400 N. Stephanie Street, Suite 265  
Henderson, Nevada 89014

*Attorneys for Defendants*

Dated: May 29, 2020

FORAN GLENNON PALANDECH PONZI  
& RUDLOFF PC

By: /s/ Lee H. Gorlin  
Dylan P. Todd, Esq.  
Lee H. Gorlin, Esq.  
2200 Paseo Verde Parkway, Suite 280  
Henderson, NV 89052

*Attorneys for Plaintiffs*

IT IS SO ORDERED:

DATED: June 5, 2020

  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

As an employee of Foran Glennon Palandech Ponzi & Rudloff PC, I certify that a copy of the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANTS' MOTION TO DISMISS OR IN THE ALTERNATIVE MOTION FOR SUMMARY JUDGMENT (ECF NO. 51) (First Request)** was served by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☒ **BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: May 29, 2020.

/s/ Rita Tuttle  
An Employee of Foran Glennon